



Dulwich Prep & Senior

SAFEGUARDING (CHILD PROTECTION) POLICY

This is a whole school policy that applies to all sections of the School, including Early Years.



Person responsible for this policy:

Designated Safeguarding Lead

This policy was last reviewed in:

September 2024

CONTENTS

PART 1: THE BASICS	5
1. INTRODUCTION	5
1.1. General	5
1.2. Safeguarding Partners	6
1.3. School Safeguarding Team	6
2. CONCERNS ABOUT A CHILD	7
3. DEFINITIONS OF SAFEGUARDING AND TYPES AND SIGNS OF ABUSE	7
4. TYPES, SIGNS AND RISK FACTORS OF CHILD ABUSE, NEGLECT AND EXPLOITATION	8
4.1. General	8
4.2. Abuse	8
4.3. Physical abuse	8
4.4. Emotional abuse	9
4.5. Sexual abuse	10
4.6. Neglect	11
4.7. Upskirting	12
4.8. Children with unexplainable and/or persistent absences from education	12
4.9. Child Sexual Exploitation (CSE)	14
4.10. Sharing nudes and semi-nudes (previously known as Sexting)	15
4.11. Child on Child abuse (previously known as Peer-on-Peer)	15
4.12. Sexual violence and sexual harassment between children	16
4.13. Serious violence	16
4.14. Child criminal exploitation (CCE)	16
4.15. County lines	17
4.16. Mental health	17
4.17. Violence Against Women and Girls (VAWG)	18
4.18. So-called 'honour-based' violence (HBV)	18
4.19. Female Genital Mutilation (FGM)	18
4.20. Forced marriage	19
4.21. Radicalisation	19
4.22. Special educational needs and disabilities	20
4.23. Lesbian, gay, bi or trans + (LGBT+)	21
4.24. Domestic Abuse	21
4.25. Homelessness	21
4.26. Private Fostering	21
4.27. Children and the court system	22
4.28. Children with family members in prison	22
5. EQUALITY STATEMENT	22
6. PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD	23
6.1. General	23
6.2. Extra Familial Harms / Contextual Safeguarding	24
6.3. Early Help	24
6.4. Procedure for staff members who have concerns about a child	25

6.5. What staff should do if a child is in danger or at risk of harm	26
6.6. What staff should do if a child is absent from education	26
6.7. What staff should do if a child requires mental health support	26
6.8. What staff should do if they have safeguarding concerns about another staff member	26
6.9. What staff should do if they have concerns about safeguarding practices in the School	27
7. ARRANGEMENTS FOR RESPONDING TO CHILD ON CHILD ALLEGATIONS	27
8. ONLINE SAFETY AND USE OF MOBILE TECHNOLOGY	28
8.1. General	28
8.2. The 4 key categories of risk	29
8.3. Meeting aims and addressing risks	29
9. REFERRALS	30
10. SCHOOL RESPONSIBILITIES	31
11. VULNERABLE PUPILS	31
12. RECORDS	32
<u>PART 2: ADMINISTRATION OF SAFEGUARDING</u>	<u>34</u>
1. MANAGEMENT OF SAFEGUARDING	34
2. RESPONSIBILITIES AND TRAINING	34
2.1. All Staff	35
2.2. DSL	36
2.3. The Head Master	37
2.4. The Governing Body	37
2.5. Nominated Governors	39
2.6. Monitoring and Review	40
3. OVERSIGHT OF SAFEGUARDING INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES	40
<u>PART 3: STAFF AND STAFFING</u>	<u>42</u>
1. SAFER RECRUITMENT	42
1.1. General	42
1.2. Volunteers	42
2. STAFF CODE OF CONDUCT	43
2.1. General	43
2.2. Contractors	45
3. ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE/CONCERNS RAISED IN RELATION TO TEACHERS AND OTHER STAFF (INCLUDING THE HEAD MASTER, GOVERNORS, SUPPLY STAFF AND VOLUNTEERS)	46
3.1. General	46
3.2. Low Level Concerns	48
4. ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE AGAINST SUPPLY TEACHERS	48
5. MANAGING SAFEGUARDING CONCERNS OF ORGANISATIONS OR INDIVIDUAL USING	

SCHOOL PREMISES	49
<u>PART 4: FURTHER SAFEGUARDING RESPONSIBILITIES</u>	<u>50</u>
1. ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES	50
1.1. Safety at Dulwich Prep & Senior	50
1.2. The Use of Photographs and Videos	50
1.3. Teaching Children How to Keep Safe	50
1.4. Looked After Children	51
1.5. Arrangements for Visiting Speakers	51
1.6. Use of electronic devices with image sharing capabilities	52
2. EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS	52
2.1. Disqualification from working in childcare	52
3. COMPLAINTS	53
4. WORKING IN PARTNERSHIP WITH PARENTS	53
<u>PART 5: APPENDICES</u>	<u>54</u>
APPENDIX A: FORM SIGNED BY STAFF	54
APPENDIX B: FRONT OF HOUSE SAFEGUARDING NOTICE TO ALL VISITORS	55
APPENDIX C: KEY CONTACT DETAILS INCLUDING FOR LOCAL CHILDREN'S SERVICES & KEY EXTERNAL CONTACT DETAILS	57
APPENDIX D: FURTHER PROCEDURES TO ADDRESS SAFEGUARDING SITUATIONS	61
APPENDIX E: UNDERSTANDING FILTERING AND MONITORING	63
APPENDIX F: SAFEGUARDING PROCESS	65
APPENDIX G: THE SEVEN GOLDEN RULES FOR SHARING INFORMATION (INCLUDING PERSONAL INFORMATION)	66
APPENDIX H: GUIDELINES AND ACTIONS NEEDED FOR CONCERN REGARDING THE SHARING OF NUDES AND SEMI-NUDES	68

SAFEGUARDING (CHILD PROTECTION) POLICY

This Safeguarding (Child Protection) Policy had five parts:

- Part 1: The Basics - including a general introduction, types and signs of abuse and procedures for dealing with concerns about a child;
- Part 2: Administration of Safeguarding - including management and responsibilities and training;
- Part 3: Staff and Staffing - including safer recruitment, and arrangements for dealing with safeguarding concerns in relation to teachers and other staff;
- Part 4: Further Safeguarding Responsibilities - including Early Years and complaints; and
- Part 5: The Appendices.

PART 1: THE BASICS

1. INTRODUCTION

1.1. General

Dulwich Prep & Senior (the **School**) is committed to providing a safe and secure environment for all members of the School community including pupils, staff, volunteers, visitors and contractors and promoting a climate where pupils and adults feel confident about sharing any concerns that they may have about their own safety or the well-being of others.

The School's Safeguarding (Child Protection) Policy has regard to the following guidance and advice:

- 'Working Together to Safeguard Children' (2018, 2022, updated February 2024);
- 'Keeping Children Safe in Education' (**KCSIE**) (September 2024);
 - o Disqualification under the Childcare Act 2006 (August 2018);
 - o What to do if you're worried a child is being abused: advice for practitioners (March 2015);
- 'Prevent Duty Guidance: for England and Wales' (July 2015, updated 2021);
 - o The Prevent Duty: Departmental advice for schools and child care providers (2015);
 - o The use of social media for on-line radicalisation (July 2015);
- The procedures produced by the London Safeguarding Children Partnership (**LSCP**) and the Southwark Safeguarding Children Partnership (**SSCP**);
- Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers (May 2024);
- The Children's Social Care National Framework (2024);
- Sharing nudes and semi-nudes; advice for education settings working with children and young people (February 2024);
- Boarding schools; national minimum standards (DfE 2023);
- Early Years Foundations Stage Statutory Framework (2021); and

- DfE Data Protection guidance for school (DfE 2024b).

The School is also guided by the standards for Independent Schools as set out in The Education (Independent Schools Standards) (England) Regulations 2014 (**ISSRs**) and the Statutory Framework for the Early Years Foundation Stage (where applicable).

The policy is applicable to all on and off-site activities undertaken by pupils whilst they are the responsibility of the School.

The School will ensure that all staff who work directly with children read at least Part One of KCSIE (including Annex B) and that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One. Where staff do not work directly with children, the School may provide Annex A (a condensed version of Part One) to ensure that they are able to understand and discharge their responsibilities as set out in the guidance.

This policy is consistent with other policies and should in particular be read in conjunction with the following policies relevant to the safety and welfare of children: Anti-Bullying Policy, Low-Level Concerns Policy, Behaviour, Rewards and Sanctions Policy, E-Safety Policy, Electronic Device Policy, Educational Visits Policy, Attendance Policy, Missing Child Procedures and Pupil Mental Health and Wellbeing Policy.

1.2. Safeguarding Partners

This policy applies to all staff, volunteers and Governors in the School and is consistent with the procedures of the 3 safeguarding partners identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017).

- **The local authority:** Eva Simcock Eva.Simcock@southwark.gov.uk
 - o Duty Number: 020 7525 3297
 - o Southwark Multi Agency Safeguarding Hub: 020 75251921 mash@southwark.gov.uk
- **Integrated care boards** (previously known as clinical commissioning groups) for an area within the LA: Apo Cagirici 020 7525 2715
- **The chief officer of police** in the Local Authority area
 - o Police Community Officer, Local Police: 020 7378 1212 / 07887450482

These partners will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs.

All adults working in the School (including visiting staff and volunteers) must ensure they are aware of the systems and procedures in place to support safeguarding and if they have any concerns, they must raise them with the Designated Safeguarding Lead (**DSL**), who is a member of the Senior Leadership Team, or a Deputy Designated Safeguarding Lead (**DDSL**).

1.3. School Safeguarding Team

Designated Safeguarding Lead: Karen McDonald-Tuckwell, k.tuckwell@dulwichpreplondon.org

Deputy Safeguarding Leads:

Louise Davidson Head Master l.a.davidson@dulwichpreplondon.org

Christopher Halls	Head of Early Years	c.halls@dulwichpreplondon.org
Shelley Whitehead	Head of Pre-Prep	s.whitehead@dulwichpreplondon.org
Sasanka Velagapudi	Head of Middle School	s.velagapudi@dulwichpreplondon.org
Kate Warren	Medical Nurse	k.warren@dulwichpreplondon.org
Edward Matten	Deputy Head	e.matten@dulwichpreplondon.org

Full contact details for the DSL and DDSLs can be found below and in **Appendix C**.

2. CONCERNS ABOUT A CHILD

The School has a duty to consider at all times the best interests of the pupil and to take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children in the School is the responsibility of the whole school community.

Parents are encouraged to raise any concerns about the safety and/or welfare of children directly with the DSL (Karen McDonald-Tuckwell k.tuckwell@dulwichpreplondon.org) or one of the DDLS (contact details of whom are included in section 1.3 above).

The School has arrangements for listening to children and providing Early Help including a School Counsellor, Children's Mental Health First Aid trained staff and a School Nurse. However, it should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful.

3. DEFINITIONS OF SAFEGUARDING AND TYPES AND SIGNS OF ABUSE

Safeguarding and promoting the welfare of children is defined as:

- **Protecting** children from maltreatment whether within or outside the home, including online;
- **Preventing** impairment of children's mental and physical health or development;
- **Ensuring** that children grow up in circumstances consistent with the provision of safe and effective care;
- **Possible** - taking action to enable all children to have the **best outcomes**; and
- **Providing** help and support to meet the needs of children **as soon as problems emerge**.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering or being likely to suffer significant harm.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

4. TYPES, SIGNS AND RISK FACTORS OF CHILD ABUSE, NEGLECT AND EXPLOITATION

4.1. General

Information taken from KCSIE and the NSPCC. See www.nspcc.org.uk for more information on signs and symptoms of abuse.

All School staff should be aware that abuse, neglect or exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSs, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

4.2. Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant in relation to the impact on all children of forms of domestic violence for example.

4.3. Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Bumps and bruises do not necessarily mean a child is being physically abused – children have accidents, trips and falls.

There is not one sign or symptom to look out for that will indicate a child is definitely being physically abused. But if a child often has injuries, there seems to be a pattern, or the explanation does not match the injury then this should be investigated.

Children who are physically abused may have:

(a) Bruises

- commonly on the head but also on the ear or neck or soft areas - the abdomen, back and buttocks;
- defensive wounds commonly on the forearm, upper arm, back of the leg, hands or feet;

- clusters of bruises on the upper arm, outside of the thigh or on the body;
- bruises with dots of blood under the skin;
- a bruised scalp and swollen eyes from hair being pulled violently; and/or
- bruises in the shape of a hand or object.

(b) Burns or scalds

- can be from hot liquids, hot objects, flames, chemicals or electricity;
- on the hands, back, shoulders or buttocks; scalds may be on lower limbs, both arms and/or both legs;
- a clear edge to the burn or scald;
- sometimes in the shape of an implement, for example, a circular cigarette burn; and/or
- multiple burns or scalds.

(c) Bite marks

- usually oval or circular in shape; and/or
- visible wounds, indentations or bruising from individual teeth.

(d) Fractures or broken bones

- multiple fractures or breaks at different stages of healing.

4.4. Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

There often aren't any obvious physical symptoms of emotional abuse or neglect but you may spot signs in a child's actions or emotions. Changes in emotions are a normal part of growing up, so it can be really difficult to tell if a child is being emotionally abused.

Babies and pre-school children who are being emotionally abused or neglected may:

- be overly-affectionate towards strangers or people they haven't known for very long;
- lack confidence or become wary or anxious;

- not appear to have a close relationship with their parents, e.g. when being taken to or collected from nursery etc; and/or
- be aggressive or nasty towards other children and animals.

Older children may:

- use language, act in a way or know about things that you wouldn't expect them to know for their age;
- struggle to control strong emotions or have extreme outbursts;
- seem isolated from their parents; and/or
- lack social skills or have few, if any, friends.

4.5. Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include: (i) sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; (ii) sexual "jokes" or taunting; (iii) physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; (iv) online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos, nudes and semi-nudes (both sometimes referred to as sexting); (v) inappropriate sexual comments on social media; (vi) exploitation; and (vii) coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Children who are sexually abused may:

- Stay away from certain people:
 - o they might avoid being alone with people, such as family members or friends; and
 - o they could seem frightened of a person or reluctant to socialise with them.
- Show sexual behaviour that's inappropriate for their age:
 - o a child might become sexually active at a young age;

- o they might be promiscuous; and
- o they could use sexual language or know information that you wouldn't expect them to.
- Have physical symptoms:
 - o anal or vaginal soreness;
 - o an unusual discharge;
 - o sexually transmitted infection (STI); and
 - o pregnancy.

4.6. Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: (i) provide adequate food, clothing and shelter (including exclusion from home or abandonment); (ii) protect a child from physical and emotional harm or danger; (iii) ensure adequate supervision (including the use of inadequate care-givers); or (iv) ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Children who are neglected may have:

- Poor appearance and hygiene. They may:
 - o be smelly or dirty;
 - o have poor dental hygiene;
 - o have unwashed clothes;
 - o have inadequate clothing, e.g. not having a winter coat; or
 - o seem hungry or turn up to school without having breakfast.
- Health and development problems. They may have:
 - o untreated injuries, medical and dental issues;
 - o repeated accidental injuries caused by lack of supervision;
 - o recurring illnesses or infections;
 - o not been given appropriate medicines;
 - o missed medical appointments such as vaccinations;
 - o poor muscle tone or prominent joints;
 - o skin sores, rashes, flea bites, scabies or ringworm;
 - o thin or swollen tummy;
 - o anaemia;

- o tiredness;
- o faltering weight or growth and not reaching developmental milestones (known as failure to thrive); or
- o poor language, communication or social skills.

4.7. Upskirting

Upskirting is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

4.8. Children with unexplainable and/or persistent absences from education

All children are entitled to an education. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are absent from education or missing from education in their area. **The children of concern will have unexplainable and/or persistent absences from education.** Effective information sharing between parents, schools, colleges and local authorities is critical to ensuring that all children are safe and receiving suitable education.

A child who is absent from education or missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. School staff must follow the School's procedures for unauthorised absence and for dealing with children that are absent from education or missing from education, particularly on repeat occasions. All unexplained and persistent absences will be followed up in accordance with the School's Attendance Policy.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones and forced marriage. Further information about children at risk of being absent or missing from education can be found in the statutory 'Children Missing Education' guidance.

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be included on both registers. Schools must place pupils on the admission register at the beginning of the first day on which the School has agreed, or been notified, that the pupil will attend the School. If a pupil fails to attend on the agreed or notified date, the School should consider notifying the local authority at the earliest opportunity to prevent the child from being absent or missing from education.

It is important that the admission register is accurate and kept up to date. Schools should regularly encourage parents to inform them of any changes whenever they occur. This can assist the School and local authority when making enquiries to locate children being absent or missing from education.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a. fulfil its duty to identify children of compulsory school age who are absent or missing from education; and

- b. follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

Where a parent notifies the School that a pupil will live at another address, the School will record on its management information system (iSAMS):

- the full name of the parent with whom the pupil will live;
- the new address; and
- the date from when it is expected the pupil will live at this address.

Where a parent of a pupil notifies the School that the pupil is registered at another school or will be attending a different school in future, the School will record in the admission register:

- the name of the new school; and
- the date on which the pupil first attended or is due to start attending that school.

The School will notify the local authority within five days when a pupil's name is added to the admission register and will provide the local authority with all the information held within the admission register about the pupil. This duty does not apply to pupils who are registered at the start of the School's youngest year, unless the local authority requests for such information to be provided.

The School will notify the local authority when a pupil's name is to be deleted from the admission register under any of the fifteen grounds set out in the Education (Pupil Registration) (England) Regulations 2006 as amended, as soon as the ground for deletion is met and no later than the time at which the pupil's name is deleted from the register. This duty does not apply where the pupil has completed the School's final year, unless the local authority requests for such information to be provided.

Where a pupil has not returned to school for ten days after an authorised absence or is absent from school without authorisation for twenty consecutive school days, the pupil may be removed from the admission register when the School and the local authority have failed, after jointly making reasonable enquiries, to establish the whereabouts of the child. This only applies if the School does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause. Advice on carrying out reasonable enquiries can be found in the statutory 'Children Missing Education' guidance.

Where a school notifies a local authority that a pupil's name is to be deleted from the admission register, the School will provide the local authority with:

- the full name of the pupil;
- the full name and address of any parent with whom the pupil lives;
- at least one telephone number of the parent with whom the pupil lives;

- the full name and address of the parent with whom the pupil is going to live, and the date the pupil is expected to start living there, if applicable;
- the name of pupil's destination school and the pupil's expected start date there, if applicable; and
- the ground in regulation 8 under which the pupil's name is to be deleted from the admission register.

The School works with the local authority to agree on methods of making returns. When making returns, the School will highlight to the local authority where they have been unable to obtain the necessary information from the parent, for example in cases where the child's destination school or address is unknown. The School should also consider whether it is appropriate to highlight any contextual information of a vulnerable child who is absent or missing from education, such as any safeguarding concerns.

It is essential that the School complies with these duties, so that local authorities can, as part of their duty to identify children of compulsory school age who are absent or missing from education, follow up with any child who might be at risk of not receiving an education and who might be at risk.

4.9. Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

Some indicators of children being sexually exploited are: going absent for periods of time or regularly coming home late; regularly absent from school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour.

A child under the age of 13 is not legally deemed capable of consenting to sex or any other type of sexual touching and therefore all incidences of sexual behaviour involving children under 13 are considered a potential criminal and child protection matter. Sexual activity with a child under 16 is also an offence. It is an offence for a person aged 18 or over to have sexual activity with a child or young person aged under 18 if that person holds a position of trust or authority in relation to the child or young person. Non-consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. CSE is therefore potentially a child protection issue for all children under the age of 18.

When it comes to the School's notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a pupil of this school, this will result in an immediate referral to

Children's Services. In the case of a young person between the ages of 13 and 16, an individual risk assessment will be conducted in accordance with the London Child Protection Procedures. This will determine how and when information will be shared with parents and the investigating agencies.

The DfE has published guidance on this entitled Child sexual exploitation: guide for practitioners

4.10. Sharing nudes and semi-nudes (previously known as Sexting)

Creating and sharing sexual photos and videos of under-18s is illegal. Sharing youth produced sexual imagery, which is commonly known as 'sexting', covers the incidents where:

- a person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18;
- a person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult; or
- a person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

When such an incident involving youth produced sexual imagery comes to a member of staff's attention, this will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. Further information and advice on youth produced sexual imagery is available in the non-statutory guidance produced by the UK Council for Child Internet Safety (UKCCIS) 'Sexting in schools and colleges' and 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (February 2024). An overview of necessary guidelines and actions is included in **Appendix H**.

4.11. Child on Child abuse (previously known as Peer-on-Peer)

Children are capable of abusing their peers. This can take different forms, such as: (i) bullying (including cyberbullying); (ii) physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; violence, particularly pre-planned, forcing other children to use drugs or alcohol, initiation/hazing type violence and rituals); (iii) emotional abuse (blackmail or extortion, threats and intimidation); and (iv) and (iv) sexual violence (as further described in the sexual abuse section at paragraph 4.5 above and the upskirting section at paragraph 4.7 above). Although it is more likely that girls will be victims and boys perpetrators, all child on child abuse is unacceptable and will be taken seriously. The School does not tolerate these or pass them off as "banter", "just having a laugh" or "part of growing up".

The School has a strong commitment to an Anti-Bullying Policy and will consider all coercive acts and child on child abuse within a Child Protection context. The School recognises that some pupils will sometimes negatively affect the learning and wellbeing of other pupils and their behaviour will be dealt with under the School's Behaviour, Rewards and Sanctions Policy. The School will minimise the risk of allegations against other pupils by providing a developmentally appropriate Life Skills (PSHCE) syllabus which develops pupils' understanding of acceptable behaviour and keeping themselves safe, having systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued, delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk, developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils. The School's procedures for responding to concerns of child on child abuse are set out section 7 of this Part 1 (Arrangements for Dealing with Child on Child Allegations).

4.12. Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline (both physically and verbally). It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. Where staff have any concerns they should follow the procedures set out in section 7 of this Part 1 (Arrangements for Dealing with Child on Child Allegations).

Concerns about or knowledge of such incidents should immediately be discussed with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). The School takes these incidents seriously and ensures that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, the School will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police. Further information is available in 'Part 5: Child on child sexual violence and sexual harassment' of DfE guidance "Keeping children safe in education".

4.13. Serious violence

All staff will be made aware of indicators, which may signal that children are at risk from, or are involved with serious crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. The School is also aware that fear and a need for self-protection is a key motivation for children to carry a weapon – it affords a child a feeling of power. Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns. All staff will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL. Further advice on these is available in the Home Office documents 'Preventing youth violence and gang involvement' and 'Criminal exploitation of children and vulnerable adults: county lines'.

4.14. Child criminal exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;

- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who are absent for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

4.15. County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas, using dedicated mobile phone lines or other forms of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are episodes of absence (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office.

4.16. Mental health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, neglect or exploitation or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL or a deputy.

Staff may also wish to communicate with the School Counsellor for guidance on how to support pupils.

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of

resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting Children and Young People's Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.

4.17. Violence Against Women and Girls (VAWG)

VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of "honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. The School also notes Southwark's VAWG Strategy.

4.18. So-called 'honour-based' violence (HBV)

HBV includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. If members of staff have a concern about or knowledge of a child that might be at risk of HBV or who has suffered from HBV, they will share it immediately with the DSL with a view to referring to appropriate agencies.

4.19. Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. The practice can cause severe pain and there may be immediate and/or long-term health consequences.

Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 40-43 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM: there may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.

If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care. If in any doubt, staff should speak to the DSL.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) teachers should follow the School's local safeguarding procedures.

4.20. Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the 'Multi-agency guidelines: Handling cases of forced marriage'. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk.

4.21. Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Staff should contact the DSL or a DDSL, who should be aware of the local procedures in place, before making a Prevent referral. The School will ensure that suitable internet filtering is in place, and equip pupils to stay safe online at school.

Examples of the ways in which people can be vulnerable to radicalisation and the indicators that might suggest that an individual might be vulnerable:

- Example indicators that an individual is engaged with an extremist group, cause or ideology include: spending increasing time in the company of other suspected extremists; changing their style of dress or personal appearance to accord with the group; their day-to-day behaviour becoming increasingly centered around an extremist ideology, group or cause; loss of interest in other friends and activities not associated with the extremist ideology, group or cause; possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups); attempts to recruit others to the group/cause/ideology; or communications with others that suggest identification with a group/cause/ideology.
- Example indicators that an individual has an intention to use violence or other illegal means include: clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills; using insulting or derogatory names or labels for another group; speaking about the imminence of harm from the other group and the importance of action now; expressing attitudes that justify offending on behalf of

the group, cause or ideology; condoning or supporting violence or harm towards others; or plotting or conspiring with others.

- Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include: having a history of violence; being criminally versatile and using criminal networks to support extremist goals; having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

There is currently a government review of preventing radicalisation following the new definition of extremism released by the government in March 2024.

Channel

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism that uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

The DSL will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to MASH. The MASH will share the referral details of new referrals with the Prevent lead police officer and Local Authority Prevent coordinator at the point the referral is received. The referral will then be processed through the MASH multi agency information sharing system and parallel to this the Prevent police officer will be carrying out initial screening checks. The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns.

4.22. Special educational needs and disabilities

Pupils with SEND or certain health conditions, may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

4.23. Lesbian, gay, bi or trans + (LGBT+)

Children who are lesbian, gay, bisexual or questioning their gender can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT+ (whether they are or not) can be just as vulnerable as children who identify as LGBT+. It is vital that staff reduce additional barriers by ensuring there is a safe space for children to speak out and share their concerns with a member of staff. It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice.

4.24. Domestic Abuse

Domestic Abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviours, violence, or abuse between those aged 16 or over who are, or have been, personally connected, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, violent, threatening, physical, sexual, financial and emotional. The definition of Domestic Abuse applies to children if they see or hear or experience the effects of the abuse and they are related to the abusive person.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children. The School should be mindful that children can often blame themselves for the abuse or may have had to leave the family home as a result of the abuse. Domestic Abuse may lead to other safeguarding concerns, and should therefore be managed under this policy. The School is part of Operation Encompass (<https://www.operationencompass.org/>).

4.25. Homelessness

Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures (depending on where the child lives), this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

4.26. Private Fostering

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives.

The law requires that Southwark Council should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

If the School becomes aware of a child in a private fostering arrangement within Southwark, it will notify the council's MASH by emailing MASH@southwark.gov.uk or calling 020 7525 1921. Advice about whether there is a need to notify the council, can be obtained by calling 07539

346808 or sending an email to privatefosteringadvice@southwark.gov.uk.

4.27. Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

4.28. Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

5. EQUALITY STATEMENT

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. The School is committed to anti-discriminatory practice and recognise children's diverse circumstances. The School ensures that all children have the same protection, regardless of any barriers they may face.

The School gives special consideration to children who:

- have special educational needs and/or disabilities (SEND) or health conditions or are young carers;
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- have English as an additional language;
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse;
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation;
- are asylum seekers;
- are at risk due to either their own or a family member's mental health needs;
- are looked after or previously looked after;
- are missing or absent from education for prolonged periods and/or repeat occasions; and/or
- whose parent/carer has expressed an intention to remove them from school to be home educated.

6. PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

6.1. General

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and Governors in the School. The School's policy and procedures also apply to extended school and off-site activities. The School plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment.

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. See the Safeguarding Process in **Appendix F** below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#), supports staff who have to make decisions about sharing information. Concern regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the DSL or a DDSL in the DSL's absence. The DSL team, and indeed any member of staff, should be guided by the 'Seven golden rules for sharing information (including personal information) (May 2024) included in **Appendix G**.

All staff should:

- listen carefully;
- avoid asking leading questions or putting words in the child's mouth;
- reassure the individual that the allegation/complaint will be taken seriously; and
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

Staff must also take steps to protect the informing pupil or adult from any retaliation or unnecessary stress resulting from a disclosure.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing: the member of staff should enter information into CPOMS (an online system for recording and disseminating information to staff responsible for safeguarding welfare) immediately. This should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence. Where an allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL or a DDSL).

Recording information on CPOMS will assist the DSL or a DDSL with their decision on the appropriate action to take, including whether or not a concern should be referred to external agencies as detailed below. Where there is any doubt as to the seriousness of a concern, advice may be sought from the Head Master (if appropriate), the Southwark Multi Agency Safeguarding Hub (**MASH**), the Local Authority Strategic Lead Officer for safeguarding in education services, or the Early Help Service (**EHS**) Duty Manager.

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are

taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that the most suitable member of the Safeguarding Team is working with the child, ensuring an open, productive and positive dialogue.

The School operates its processes with the best interests of the pupil at their heart.

Safeguarding children involves more than protecting children from abuse, and the School recognises its responsibilities to respond to all concerns about children, whether of a safeguarding nature or not. The School's Safeguarding Team will be informed of any concerns, on a "need to know" basis, that are not judged to indicate that a child is 'at risk' or 'in need' but to ensure that the needs of the child can be met. Further consideration needed by the Safeguarding Team will include those issues detailed in paragraphs 6.2 to 6.9 below.

6.2. Extra Familial Harms / Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and DDSs, should consider the context within which such incidents and/or behaviours occur. The School will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

6.3. Early Help

Early Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs and/or disabilities (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently absent/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is experiencing, or is at risk of experiencing family ostracism;
- is a privately fostered child;

- has a parent or carer in custody or is affected by parental offending; and/or
- has experienced multiple suspensions, is at risk of being permanently excluded from school.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the Southwark Safeguarding Children Partnership referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

Procedures of specific situations are given below for:

- staff members who have concerns about a child (see paragraph 6.4);
- what staff should do if a child is in danger or at risk of harm (see paragraph 6.5);
- what staff should do if a child is absent from education (see paragraph 6.6);
- what staff should do if a child requires mental health support (see paragraph 6.7).
- what staff should do if they have safeguarding concerns about another staff member (see paragraph 6.8); and
- what staff should do if they have concerns about safeguarding practices in the School (see paragraph 6.9).

Procedures for the following situations are then given in **Appendix D**:

- what staff should do if a child is seen as at risk of radicalisation (see paragraph 1 of Appendix D);
- what staff should do if they have concerns that children are at risk from or involved with serious violent crime (see paragraph 2 of Appendix D);
- what staff should do if a child needs a social worker (Children in Need and Child Protection Plans) (see paragraph 3 of Appendix D); and
- what staff should do if they discover an act of Female Genital Mutilation (**FGM**) (see paragraph 4 of Appendix D).

6.4. Procedure for staff members who have concerns about a child

If staff (including Governors, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and Children's Social Care as appropriate. All concerns, discussions and decisions made and the

reasons for those decisions should be recorded in writing on CPOMS.

6.5. What staff should do if a child is in danger or at risk of harm

If staff (including Governors, agency staff and volunteers) believe that a child is in **immediate** danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

A full copy of the London Child Protection Policy Procedures, followed by Southwark, can be found at <https://www.londonsafeguardingchildrenprocedures.co.uk/>.

6.6. What staff should do if a child is absent from education

Dulwich Prep & Senior has an Attendance Policy. Children who are absent from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for dealing with children who are absent from education are contained in the "Children with unexplainable and/or persistent absences from education" in paragraph 4.8 of Part 1 this policy.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child is absent from education is also identified as a welfare and/or safeguarding concern.

The School will report to Southwark Council (or the relevant local authority in which the pupil resides) a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

6.7. What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School has a designated Mental Health Lead to support staff and pupils and a school counsellor who will work with individual cases as needed.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the Department for Education (DfE) Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing and resilience among young people.

6.8. What staff should do if they have safeguarding concerns about another staff member

If staff have safeguarding concerns, including low-level concerns, about another staff member (including supply staff and volunteers), then this should be referred to the Head Master. Where there are concerns about the Head Master, this should be referred to the Chair of Governors. In

the event of allegations of abuse being made against the Head Master, staff are referred to the procedures in section 3 of Part 3 of this Policy below regarding managing allegations of abuse against staff (including volunteers).

6.9. What staff should do if they have concerns about safeguarding practices in the School

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's Whistleblowing Policy. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found in **Appendix C** of this policy.

7. ARRANGEMENTS FOR RESPONDING TO CHILD ON CHILD ALLEGATIONS

Members of staff should remember that pupils may perpetrate abuse as well as adults.

Child on child abuse is abuse by one or more pupils against another pupil. It can be standalone or as part of wider abuse. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying), physical abuse, initiation/hazing violence and rituals, upskirting, consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery), sexual assault, gender-based issues and harmful sexual behaviours including sexual violence and sexual harassment. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes, causing someone to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party, and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". The School has a zero-tolerance approach to any form of child on child abuse.

The School recognises that where there are no reported cases of child on child abuse, this does not mean it is not happening. The School therefore works proactively to prevent such incidents and appropriately respond when reported.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

The School recognises that children with special educational needs and disabilities (**SEND**) can be more prone to child on child group isolation than other children and will consider extra pastoral support for those children with the SEND team or the School Counsellor.

A bullying incident or bullying which gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' should be treated as a safeguarding concern and staff should follow the procedures below rather than the School's Anti-Bullying Policy and Behaviour, Rewards and Sanctions Policy. In severe cases of child on child abuse, a referral would be made to an external safeguarding agency.

The School's steps to minimise the risk of child on child abuse are found in the School's

Anti-Bullying Policy.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from MASH on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of MASH, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from MASH and/ or the Police as appropriate.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The School's approach to sharing nudes and semi-nudes is outlined in **Appendix H** and the Behaviour, Rewards and Sanctions Policy.

In the event of disclosures about child on child abuse, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the School Counsellor and Pastoral Team and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- the alleged perpetrator; and
- the other children (and, if appropriate, staff) at the School.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises and School transport.

8. ONLINE SAFETY AND USE OF MOBILE TECHNOLOGY

8.1. General

This section summarises the School's approach to online safety and use of electronic devices with image sharing capabilities. For further details about the School's policy in these areas, please refer to the E-Safety Policy and Electronic Device Policy. Furthermore, the School aims to fulfil [The Cyber Security Standards for Schools](#) (2023) guidance.

The School recognises the importance of safeguarding children from potentially harmful and inappropriate online material, and understands that technology is a significant component in many safeguarding and wellbeing issues.

To address this, the School aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and Governors (see **Appendix E**).
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which the School may also refer to as 'mobile phones').
- Set clear guidelines for the use of electronic devices with imaging and sharing capabilities for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

8.2. The 4 key categories of risk

The School's approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism;
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

8.3. Meeting aims and addressing risks

To meet the School's aims and address the risks above, the School will educate pupils about online safety as part of the curriculum. For example:

- the safe use of social media, the internet and technology;
- keeping personal information private;
- how to recognise unacceptable behaviour online;
- how to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim;
- train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year;
- educate parents/carers about online safety via communications sent directly to them and during parents' evenings;

- make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - o staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present; and
 - o staff will not take pictures or recordings of pupils on their personal phones or cameras;
- make pupils (Years 5 to 8) aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the School's ICT systems and use of their mobile and smart technology;
- make pupils, parents/carers, staff, volunteers and Governors aware that they are expected to read, understand and abide by the acceptable use of electronic devices detailed in the Electronic Device Policy;
- explain the sanctions the School will use if a pupil is in breach of the policies on the acceptable use of the internet and electronic devices with imaging and sharing capabilities;
- make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#);
- put in place robust filtering and monitoring systems to limit children's exposure to the four key categories of risk (described in paragraph 8.2 above) from the School's IT systems. Please refer to the E-Safety Policy and Electronic Device Policy;
- carry out an annual review of the School's approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by the School community;
- provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively; and
- review this Safeguarding (Child Protection) Policy (including online safety) annually and ensure the procedures and implementation are updated and reviewed regularly.

9. REFERRALS

Referrals under the above procedures, unless otherwise stated, should be made to MASH via a Common Assessment Framework (**CAF**) form and copied to the LA's Schools Safeguarding Coordinator. Prior to any written CAF being sent as a referral to social care, there should be a verbal consultation with the MASH social worker or manager, by calling the duty desk on **020 7525 1921**, to ensure that making a referral is an appropriate action.

Referrals will normally be made by the DSL, but anybody can make a referral (see information in **Appendix C** for key contact details of external agencies).

The parent/carer will normally be contacted to obtain their consent before a referral is made. However, this will not always be appropriate, for example, if the concern involves alleged or suspected child sexual abuse, Honour Based Violence, fabricated or induced illness or the DSL has reason to believe that informing the parent might compromise the health, safety or well-being of the child. A rationale for the decision to progress without consent should be

provided with the referral.

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the child protection (CP) referral process should not delay the administration of first aid or emergency medical assistance.

If, for example, a pupil is thought to be at immediate risk of harm because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child from school during the school day, urgent action is required which may include contacting the Police. Where a child sustains a physical injury or is distressed as a result of reported chastisement, or alleges that they have been chastised by the use of an implement or substance, this must also be acted on immediately.

10. SCHOOL RESPONSIBILITIES

All parents accepting a place at Dulwich Prep & Senior are required to sign an acceptance of the School's Contract for Educational Services. In situations where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the School, parents will be notified of this as soon as possible.

Dulwich Prep & Senior recognises the need to be alert to the risks posed by strangers or others (including the parents/carers of other pupils) who may wish to harm children either in school or outside school and will take all reasonable steps to lessen such risks as detailed in this Safeguarding (Child Protection) Policy and related policies.

Pupils are reminded in assemblies, form times and in PSHCE (Life Skills) lessons to whom they are able to talk. That may be the Head of Year, Head of Section, their Form Tutor, the School Counsellor, the School Nurses, the Head Master or a member of the Safeguarding Team. They are encouraged to find a person they trust and to speak about issues worrying them.

11. VULNERABLE PUPILS

Particular vigilance will be exercised in respect of pupils who are subject to Child Protection Plans and are a 'Looked After' child.

The School also recognises that those pupils with specific mental or physical health needs which require greater support must also be closely monitored by the safeguarding team along with any children who identify as LGBT or may be perceived by others as LGBT.

The School acknowledges that children with SEND can face additional safeguarding challenges. The School is aware that additional barriers can exist when recognising abuse, neglect or exploitation in this group of children. This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; children with SEND can be disproportionately impacted by things like bullying-without outwardly showing any signs; and may have communication barriers and difficulties in overcoming these barriers.

If a pupil discloses that they have witnessed domestic abuse or it is suspected that they may be living in a household which is affected by family violence, staff must follow the procedure in paragraph 6.1 of Part 1 of this Policy and refer this to the DSL. A record will be shared with the police in line with Operation Encompass. The School is a member of the Southwark Safe Space initiative and aims to provide a space for parents or carers who are experiencing domestic abuse.

The School also acknowledges the additional need for support and protection of children who are vulnerable by virtue of homelessness, refugee/asylum seeker status or the effects of

substance abuse within the family, those who are young carers, mid-year admissions, pupils who are excluded from school and pupils where English is an additional language, particularly for very young children, using the translation service if necessary.

The School acknowledges that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, school work or other children.

When it comes to the School's notice that a child under the age of 13 years is, or may be, sexually active, whether or not they are a pupil of this school, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 16, an individual risk assessment will be conducted in accordance with the London Child Protection Procedures. This will determine how and when information will be shared with parents and the investigating agencies.

Alternative Provision: where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

12. RECORDS

Brief and accurate written notes must be kept of all incidents on CPOMS. The notes stored in CPOMS are significant especially if the incident or the concern does not lead to a referral to other agencies. This information may be shared directly with other agencies as appropriate and in accordance with data protection law. All contact with parents and external agencies will be logged and these will be kept as Child Protection records. The School will take into account the views and wishes of the child and this will be noted on CPOMS.

All Child Protection records are kept securely and confidentially by the DSL and separately from educational records in CPOMS. They may only be accessed by the DSL, the DDSLs and the Head Master.

The DSL should also record discussions and decisions made including the rationale for those decisions. Records should also show instances where referrals were or were not made to other agencies, e.g. Prevent.

If a pupil is withdrawn from the School before Year 8 for any reason, all efforts will be made to identify any new home address and the School to which they are being admitted, so that their educational records can be sent without delay to the child's new school. If the parent/carer fails to provide this information, an urgent referral will be made to the Early Help Service either through the EHS Duty Officer or through the local team manager in order that they might make further enquiries. If the School receives educational records concerning a child who is not registered with us, the records must be returned promptly and securely to the sending school accompanied with a letter advising them to refer to their LA's Children's Services Department. A pupil's name will only be removed from the School's Admission Register in accordance with the Pupil Registration Regulations or with the authorisation of the Local Team Manager in the Early Help Service.

The content of Child Protection Conference or Review reports prepared by the School will follow the headings recommended by Children's Services and will, wherever possible, be shared with the parents/carer in advance of meetings.

The School will require documentary proof as to the identity of pupils presented for admission. If there is any doubt as to the identity of a pupil, advice will be sought from the local authority and other statutory agencies as appropriate. The School will maintain accurate and up to date

records of those with Parental Responsibility and emergency contacts. Pupils will only be released to the care of those with Parental Responsibility or someone acting with their consent.

Child Protection records will be sent to receiving schools separately and under a confidential cover when pupils leave the School, ensuring secure transit and a confirmation of receipt will be obtained.

For further guidance refer to the DfE Data Protection guidance for schools (DfE 2024b). Appendix G also gives helpful guidance.

PART 2: ADMINISTRATION OF SAFEGUARDING

1. MANAGEMENT OF SAFEGUARDING

Karen McDonald-Tuckwell, Head of Lower School, is the Designated Safeguarding Lead (DSL). **Appendix C** contains the DSL's contact details.

Christopher Halls (Head of Early Years), **Kate Warren** (School Nurse), **Sasanka Velagapudi** (Head of Middle School), **Shelley Whitehead**, (Head of Pre-Prep), **Louise Davidson** (Head Master) and **Edward Matten** (Deputy Head) are the Deputy Designated Safeguarding Leads (**DDSLs**). The DDSLs are the persons to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times. **Appendix C** contains the DDSL's contact details.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice.

The DSL works with the Head Master and the Governors to review and update this Safeguarding (Child Protection) Policy. When a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

The DSL or a DDSL will always be available to discuss safeguarding concerns. During term time, the DSL and/ or a DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the DSL or a DDSL will always be on call via a pre-arranged contact.

The DSL or a DDSL should liaise with the three safeguarding partners and work with other agencies in line with *Working Together to Safeguard Children*. "NSPCC - When to call the police" can assist the DSL or a DDSL understand when they should consider calling the police and what to expect when they do.

The DSL is the first point of contact for external agencies, including for children within the EYFS, who are pursuing Child Protection investigations and co-ordinates the School's representation at Child Protection conferences and Core Group meetings (including the submission of written reports for conferences).

Full details of the DSL's role can be found at Annex C of KCSIE.

Whilst the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

2. RESPONSIBILITIES AND TRAINING

Induction and training are in line with advice from DfE and Southwark Safeguarding Children Partnership.

2.1. All Staff

All new staff (including temporary staff and volunteers) will be provided with induction training that includes:

- this Safeguarding (Child Protection) Policy;
- the role and identity of the DSL(s) and the DDSLs;
- the Behaviour, Rewards and Sanctions Policy;
- the Staff Code of Conduct, Low Level Concerns Policy, Whistleblowing Policy, ICT Acceptable Use Policy and Social Media Policy;
- the safeguarding response to children who are absent or missing from education; and
- a copy of Part One of KCSIE including Annex B.

School leaders and Governors are required to read KCSIE in its entirety and Annex B.

Copies of the above documents are provided to all staff during induction.

All new and temporary staff will be required to attend an induction session with the DSL, a DDSL or the HR Manager (who has completed Level 3 Safeguarding Training) on their first day in the School. All newly recruited staff (teaching and non-teaching) and Governors will also be required to attend relevant Local Authority or Safeguarding Board training.

All staff are also required to:

- read Part One of KCSIE and Annex B and confirm that they have done so. Each time Part One of KCSIE is updated by the Department for Education, staff will be updated on the relevant changes by the DSL as part of their August INSET before the new academic year;
- understand key information contained in Part One of KCSIE and Annex B. The School will ensure staff understanding by monitoring use of CPOMS and use of termly updates and reviews;
- receive training in safeguarding and child protection regularly, in line with advice from the DfE and Southwark Safeguarding Children Partnership. Training will include online safety and harmful sexual behaviours (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help;
- be trained, understand and reinforce the importance of online safety when communicating with pupils, parents and carers;
- understand the expectations, for staff around filtering and monitoring for the online safety of pupils (see **Appendix E**); and
- undertake regular informal updates, at least termly, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, for example, emails, e-bulletins and staff meetings.

All staff also receive training on appropriate record keeping. Staff are required to enter all data concerning a child into CPOMS.

2.2. DSL

The DSL will be given the time, funding, training, resources and support to:

- provide advice and support to other staff on child welfare and child protection matters;
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- contribute to the assessment of children;
- refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly;
- have a good understanding of harmful sexual behaviour; and
- have a good understanding of the filtering and monitoring systems and processes in place at the School.

The DSL will also:

- keep the Head Master informed of any issues;
- liaise with Local Authority case managers and designated officers for child protection concerns as appropriate;
- be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support; and
- be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

The DSL and DDSLs receive updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in Southwark Safeguarding Children Partnership approach to Prevent duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of KCSIE.

In addition to this formal training, their knowledge and skills will be updated and refreshed (for example, via e-bulletins, meeting other designated safeguarding leads or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role.

Designated staff will be encouraged to attend appropriate network meetings and to participate in the multi-agency training programme organised by the SSCP.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with government information sharing advice.

When children leave the School (including in year transfers) the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools and colleges and DPL as the receiving school should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named person with oversight for SEND in colleges, are aware as required.

2.3. The Head Master

The Head Master is responsible for the implementation of this policy, including:

- ensuring that staff (including temporary staff) and volunteers:
 - are informed of the School's systems which support safeguarding, including this policy, as part of their induction; and
 - understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect or exploitation;
- communicating this policy to parents/carers when their child joins the School and via the School website;
- ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;
- making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this;
- ensuring the relevant staffing ratios are met, where applicable;
- making sure each child in the Early Years Foundation Stage is assigned a key person; and
- overseeing the safe use of technology, and electronic devices with imaging and sharing capabilities in the setting.

2.4. The Governing Body

The Governing Body will:

- facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development;
- evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head Master to account for its implementation;
- be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the School's local multi-agency safeguarding arrangements;
- appoint a Governor to monitor the effectiveness of this policy in conjunction with the full Governing Body. This is always a different person from the DSL;
- ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners;
- ensure that the School has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training;
 - reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the School in meeting these standards;
 - ensuring the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;
 - ensuring online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies;
 - ensuring the DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place;
 - ensuring the School has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors); and
 - ensuring that this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll), the Governing Body will:

- seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed;
- make sure there are arrangements for the body to liaise with the School about safeguarding arrangements, where appropriate; and

- make sure that safeguarding requirements are a condition of using the School premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance 'For Organisations' which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Head Master, where appropriate.

All Governors will read Keeping Children Safe in Education in its entirety.

The members of the Governing Body will ensure that they comply with their duties under legislation and that the policies, procedures and training in the School are effective and comply with the law at all times. All members of the Governing Body will undertake mandatory safeguarding induction training. Annual Safeguarding training will be delivered by the DSL combined with child protection updates.

The Governing Body will ensure that the School contributes to inter-agency working in line with statutory guidance "Working Together to Safeguard Children" and that the School's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by Southwark Safeguarding Children Partnership.

The School considers its obligation to review safeguarding practises as a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, or sooner if required (for example if there are any legislative or regulatory changes). The policy will be formally signed off by the Chair of Governors, on behalf of the full Governing Body, at least annually.

The School draws on the expertise of staff, including the DSL and DDSLs, in shaping the School's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

2.5. Nominated Governors

The Governing Body has nominated **Henrietta Deasy** as a lead to take leadership responsibility for the School's safeguarding arrangements (the **Safeguarding Governor**). She is assisted in this role by **Charlie Fairhurst**. Their contact details can be found at **Appendix C**.

The Governing Body has nominated **Kate Kelleher, Chair of Governors**, to liaise with the local authority and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Head Master and this person will attend any strategy meetings called in respect of such an allegation against the Head Master. Her contact details can be found at **Appendix C**.

The Safeguarding Governor will meet on a regular basis with the DSL to monitor both the volume and progress of cases where a concern has been raised to ensure that the School is meeting its duties in respect of safeguarding. As a good practice, the Safeguarding Governor will carry out an

audit of the School's safeguarding practices and report back to the Governing Body on an annual basis. This is in addition to and does not replace the responsibility that rests with the Head Master to monitor and support the work of the DSL.

2.6. Monitoring and Review

Dulwich Prep & Senior's Governing Body will review this Policy and consider safeguarding issues and their implications for the School on an annual basis.

The Safeguarding Governor will carry out an annual audit of the School's safeguarding practices and report back to the Governing Body.

As good practice, the DSL will provide a termly report to the Governing Body outlining details of any safeguarding issues that have arisen during the term and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name.

The Head Master/DSL will report to the Governing Body on levels of child protection referrals made by Dulwich Prep & Senior during the past year and training undertaken by school staff and Governors. The School will ensure it has procedures in place to meet the required monitoring guidance. The School will ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay once identified.

The Governing Body will evaluate the safeguarding arrangements in school using evidence of the:

- extent to which a positive culture and ethos is created where safeguarding is an important part of everyday life in the School, backed up by training at every level;
- content, application and effectiveness of safeguarding policies and procedures, and safer recruitment and vetting processes;
- quality of safeguarding practice, including evidence that staff are aware of the signs that children may be at risk of harm either within the setting or in the family or wider community outside the setting;
- timeliness of response to any safeguarding concerns that are raised; and
- quality of work to support multi-agency plans around the child.

Any member of staff who has concerns that the duties of the Safeguarding Team are not being carried out correctly should use the School's Whistleblowing Policy to alert senior management of their concerns.

3. OVERSIGHT OF SAFEGUARDING INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Henrietta Deasy is the board-level lead in relation to policies and procedures for safeguarding arrangements in the School and is assisted in this role by **Charlie Fairhurst**. They are members of the governing body and their contact details can be found in **Appendix C**.

The School considers its obligation to review safeguarding practises as a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The School draws on the expertise of staff, including the DSL and DDSLs, in shaping the School's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

PART 3: STAFF AND STAFFING

1. SAFER RECRUITMENT

1.1. General

Dulwich Prep & Senior is committed to safer recruitment and, as part of that, adopts safer recruitment procedures that help deter, reject and/or identify people who might abuse children. All details of the School's written recruitment and selection policy and procedures are contained within the Recruitment Policy.

Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. An online search will also be conducted as part of due diligence on shortlisted candidates. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Relevant members of staff and Governors who are involved in recruitment will undertake safer recruitment training. The School will ensure that at least one person on any appointment panel has undertaken safer recruitment training in line with staffing regulations.

Dulwich Prep & Senior will only use employment agencies which can demonstrate that they positively vet their supply staff and will report the misconduct of temporary or agency staff to the agency concerned and to the LA. Staff joining the School on a permanent or temporary basis will be notified of the Safeguarding (Child Protection) Policy and will be given a copy of the School's guidance on Safeguarding procedures. All staff are required to sign confirmation (attached at **Appendix A**) of understanding the Safeguarding (Child Protection) Policy and Procedures having completed a full safeguarding induction.

Assurance will be gained that staff of another organisation have been checked for suitability if they supervise the School's pupils on a site other than the School.

1.2. Volunteers

Any parent or other person/organisation engaged by the School to work in a regular voluntary capacity with pupils will be subject to all reasonable vetting procedures and Disclosure and Barring Checks.

Under no circumstances will a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

Volunteers who, on an unsupervised basis, teach or look after children regularly, or provide personal care on a one-off basis in the School are deemed to be in regulated activity. The School will obtain an enhanced DBS certificate (which will include barred list information) for all volunteers who are working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, the School may conduct a repeat DBS check (which will include barred list information) on any such volunteer should it have any concerns.

The law has removed supervised volunteers from regulated activity. There is no legal requirement to obtain a DBS certificate for volunteers who are not in regulated activity and who

are supervised regularly and on an ongoing day to day basis by a person who is in regulated activity, but an enhanced DBS check without a barred list check may be requested following a risk assessment.

Further information on checks on volunteers can be found in Part three of the DfE guidance KCSIE.

Volunteers will be subject to the same code of conduct as paid employees of the School. Volunteers will be provided with the School's safeguarding information and regular volunteers will be required to read and sign the Safeguarding Children form (attached at **Appendix A**). Volunteers will not be given responsibility for the personal care of pupils. Voluntary sector groups that operate within the School, provide off site services for pupils or use school facilities will be expected to adhere to this policy or operate a policy which is compliant with the procedures adopted by Southwark Safeguarding Children Board. Premises lettings and loans are subject to acceptance of this requirement and failure to comply would result in termination of the agreement.

2. STAFF CODE OF CONDUCT

2.1. General

All staff (paid/voluntary) are expected to adhere to a Staff Code of Conduct in respect of their contact with pupils and their families, which can be found in the School's Employment Policies. The Teachers' Standards 2021 state that all teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. Staff will endeavour to create and embed a culture of openness, trust and transparency in which the School's Values and behaviour expectations, are lived, monitored and reinforced. Children will be treated with respect and dignity and no punishment, detention, restraint, sanctions, or rewards are allowed outside those detailed in the School's Behaviour, Rewards and Sanctions Policy. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Where incidents occur which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a pupil for their own protection or others' safety, this will be appropriately recorded and reported to the Head of Section, Head Master, DSL and parents. Any physical restraint used will comply with the School's Behaviour, Rewards and Sanctions Policy, DfE and Local Authority guidance.

Members of staff should avoid any gratuitous physical contact with pupils that may be misconstrued by a pupil, parent or observer. There will be occasions when physical contact is acceptable and, in general, these will fall into one of three categories:

- Reasonable action to prevent harm or injury to the pupil or to others: the use of minimum force and contact necessary to prevent harm or injury (taking into account the age and any SEND a pupil may have) is acceptable and defensible. Such incidents should be recorded in writing and must always be reported to the Head Master immediately.
- Comforting a pupil in distress: what is acceptable will depend on the circumstances – the age and understanding of the pupil (including any SEND the pupil may have), the extent and cause of the distress, and the alternative means of providing comfort – so professional judgement and discretion will need to be exercised in relation to these factors. Staff should consider how others might perceive the action. Particular care must be taken in instances which involve the same pupil over a period of time.

- Unavoidable contact where it may be proper and necessary, for example, to demonstrate exercises or techniques in PE, music teaching, drama and when administering First Aid. All staff should be alert to the possibilities of contact being misinterpreted and open to the scrutiny of colleagues and ensure that their behaviour does not make children feel uncomfortable or inadvertently lay them open to allegations of abuse.

Members of staff should ensure that children have appropriate privacy when changing clothes, using the toilet or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard young people, satisfy health and safety considerations and ensure that poor behaviour does not occur. This supervision should be appropriate to the needs and age of the children and sensitive to the potential for embarrassment. With older children, staff should normally place themselves immediately outside the main changing area or toilet area. If staff need to enter to ensure the safety of the children, they should knock and announce that they are entering, and they should only stay in the area for as long as is necessary to ensure safety. Members of staff should not use pupils' toilets, and the time spent in shared public changing rooms or toilets should be kept to a minimum, with staff-pupil use of such facilities deliberately staggered so as not to coincide where possible. If a member of staff believes their actions in any of these areas could be misinterpreted, the DSL should be informed immediately.

Except in cases of emergency or minor cuts/scrapes in the playground, first aid will only be administered by qualified First Aiders. If it is necessary for the child to remove clothing for first aid treatment there will, wherever possible, be another adult present. If a child needs help with toileting, nappy changing or washing after soiling themselves, another adult should be close by. All first aid treatment and non-routine changing or personal care will be recorded and shared with parents/carers at the earliest opportunity.

Children requiring regular medication or therapies for long term medical conditions will be seen by the staff in the Medical Centre and appropriate care plans will be devised in agreement with the parents/carers.

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. Other than in formal teaching situations, musical instrument tuition for example, the door to the room in which the 1:1 coaching, counselling or meeting is taking place should be left open. Where this is not practicable because of the need for confidentiality, another member of staff should be close by and a record kept of the circumstances of the meeting. All rooms that are used for the teaching or counselling of pupils will have clear and unobstructed glass panels in the doors.

School staff should also be alert to the possible risks that might arise from social contact with pupils outside the School. Home visits to pupils or private tuition of pupils should only take place with the knowledge and approval of the Head Master. Visits/telephone calls by pupils to the homes of staff should only occur in exceptional circumstances and with the prior knowledge and approval of the Head Master. Any unplanned contact of this nature or suspected infatuations will be reported to the Head Master. Staff supervising off site activities or school trips will be provided with a school mobile telephone as a point of contact for parents/carers. Staff should not give their personal mobile phone numbers to pupils, nor communicate with them by text message or personal email. If it is necessary to speak to a pupil by telephone, they should use one of the School's telephones or block their own mobile number so it is unidentifiable. Staff should not engage in online communication with pupils via personal accounts or on social media platforms not recommended by the School. Likewise, unregulated internet 'chat rooms' for children (or similar on-line forums) should not be used and staff should be aware that it is impossible to determine the age of any participant in these environments.

Staff will only use the School's digital technology resources and systems for professional

purposes or for uses deemed 'reasonable' by the Head Master and Governing Body. Staff will only use the approved school email, school Learning Platforms or other school approved communication systems with pupils or parents/carers and will not disclose their personal telephone numbers and email addresses to pupils or their parents. Staff will not use personal cameras (digital or otherwise) or camera phones for taking and transferring images of pupils or staff without prior permission from the Head Master and will not store images at home or on a digital cloud.

Staff should be alert to behaviours that may cause 'low level' concerns such as over familiarity with children, having favourites, engaging with a child on a 1:1 basis behind a closed door.

Staff should be aware of the School's Low Level Concern policy and Whistleblowing Policy and share immediately any disclosure or concern that relates to a member of staff with the Head Master, or with the DSL if the Head Master is not available. Nothing should be said to the colleague involved. Any disclosures or concerns about the Head Master should be shared with the Chair of Governors or with the Safeguarding Governor if the Chair of Governors is not available.

2.2. Contractors

Contractors who are engaged by or on behalf of the School to undertake works on site will be made aware of this policy and the reasons for this. The School will ensure that any contractor, or employee of a contractor, who works at the School has been subject to the appropriate DBS check. These checks will be undertaken when individual risk assessments by the Leadership Team deem this to be appropriate. This risk assessment will identify those contractors engaging in regulated activity who require an enhanced DBS check including barred list information.

During major works, when large numbers of workers and subcontractors may be on site during term time, Health and Safety risk assessments will include the potential for contractors or their employees to have direct access to pupils in non-teaching sessions. All contractual organisations who work with or for the School will be sent a copy of this policy and the School's Staff Code of Conduct, with a covering letter stating the School's safeguarding responsibilities. They are required to sign and return a form (attached at **Appendix A**) in acknowledgement of their understanding and consent, and that they are willing to comply with the School's Safeguarding (Child Protection) Policy.

Individuals and organisations that are contracted by the School to work with or provide services to pupils will be expected to adhere to this policy and their compliance will be monitored.

Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children. Under no circumstances will the School allow a contractor in respect of whom no checks have been obtained to work unsupervised, or engage in regulated activity related to children. The School will determine the appropriate level of supervision depending on the circumstances. The School will always check the identity of contractors and their staff on arrival at the School.

If an individual working at the School is self-employed, the School will consider obtaining the DBS as self-employed individuals are not able to make an application to the DBS on their own account.

3. ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE/CONCERNS RAISED IN RELATION TO TEACHERS AND OTHER STAFF (INCLUDING THE HEAD MASTER, GOVERNORS, SUPPLY STAFF AND VOLUNTEERS)

3.1. General

Dulwich Prep & Senior takes seriously all allegations made and concerns raised in relation to members of staff (including Governors, supply staff and volunteers).

The School is committed to promoting an open and transparent culture in which all concerns about all adults working in or on behalf of the School are dealt with promptly and appropriately.

These procedures for managing allegations against a teacher or member of staff (including the Head Master, supply staff, Governors, contractors and volunteers) who are currently working in the School follow DfE statutory guidance and London Safeguarding Children Partnership arrangements and apply when staff (including volunteers) have (or are alleged to have)¹:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm if he or she works regularly or closely with children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children, which is known as transferable risk.

Allegations against a teacher who is no longer teaching, or members of support staff no longer working at the School, should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the LADO or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.

Concerns including allegations about a staff member should be investigated as a priority to avoid any delay.

There may be two levels of allegation/ concern: (i) allegations that may meet the harm threshold; and (ii) allegations/ concerns that do not meet the harm threshold - known as '**Low Level Concerns**'.

- a. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head Master or to the DSL in the Head Master's absence. If an allegation is reported to the DSL, the DSL will keep the Head Master informed. Where the Head Master or DSL is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors (or Safeguarding Governor in the Chair's absence). Where the Head Master or DSL is the subject of the allegation or concern, the Head Master or DSL must not be informed of the allegation prior to contact with the Chair of Governors and LADO.

¹ Also note the '[Safeguarding information for professionals and the community in Southwark](#)' on Southwark Council's website.

Once referred, some cases may not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements will be followed to resolve cases without delay. Some rare allegations will be so serious they will require immediate intervention by children's social care services and/or police. In such cases, referral to the LADO will lead to a Strategy Meeting or Discussion being held in accordance with the DfE guidance and London Safeguarding Children Partnership (**LSCP**) procedures. This process will agree upon the appropriate course of action and the time-scale for investigations.

The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) Contact can also be made with LA's Schools Safeguarding Coordinator who will liaise with the LADO. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.

- b. The case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and give an explanation of the likely course of action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
- c. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the LADO, 'Working Together' statutory guidance and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.
- d. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
- e. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service and/or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service (whether employed, contracted, a volunteer or a student) when an individual is removed from regulated activity (or would have been removed had they not left) and the School believes the individual has engaged in relevant conduct in relation to children and/or adults, satisfied the harm test in relation to children and/or vulnerable adults or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable

professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

- f. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

3.2. Low Level Concerns

The term 'Low Level Concern' does not mean that it is insignificant. It means that the behaviour towards a child does not meet the thresholds set out above. A Low Level Concern is any concern, no matter how small, that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate behaviour outside of work. Concerns may come from various sources whether a suspicion, complaint, disclosure or as a result of vetting checks.

Examples of a Low Level concern might be: being over-friendly with children, having favourites, engaging with a child on a 1:1 basis behind closed doors or using inappropriate language. All low-level concerns will be brought immediately to the attention of the Head Master or the DSL if the Head Master is not available. In cases where the Head Master is the cause for concern, they will be reported to the Chair of Governors. The School will contact the LADO for consultation.

A full Low Level Concerns Policy is available.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE and a copy will only be provided to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse. All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head Master will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

4. ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE AGAINST SUPPLY TEACHERS

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the School, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

5. MANAGING SAFEGUARDING CONCERNS OF ORGANISATIONS OR INDIVIDUAL USING SCHOOL PREMISES

The School will work with providers of after-school activities and community activities on the School site to follow the guidance set out in [Keeping Children Safe during community activities, after school clubs and tuition](#) (DfE 2020).

If the School receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities) then, as with any safeguarding allegation, the School will follow their usual safeguarding policies and procedures, including informing the LADO.

PART 4: FURTHER SAFEGUARDING RESPONSIBILITIES

1. ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

1.1. Safety at Dulwich Prep & Senior

Entry to the Dulwich Prep & Senior site on Alleyn Park is controlled by doors that are secured physically or supervised by staff. Where parents are welcomed onto the School site for events, their interaction with children is supervised. The School Reception is staffed by receptionists during school opening hours during the School term.

Entry to the Early Years Department on Gallery Road is controlled by a buzzer operated by the receptionist and staff.

Visitors to the School will be asked to read 'Our Safeguarding Responsibilities' notice (attached at **Appendix B**), will be logged into and out of the premises, will be asked to wear School visitor badges and will be accompanied at all times. Unidentified visitors will be challenged by staff and reported to the DSL and/or School Office.

The presence of intruders and suspicious strangers seen loitering near the School or approaching pupils, will be reported to the Police by calling 101 or 999, depending on the circumstances and the urgency of the case so that if police stops these individuals they can be spoken to about what they were doing and dealt with accordingly. Brief information about the incident will be sent to LA's Schools Safeguarding Coordinator with a view to alerting other local schools in liaison with the police and through appropriate systems.

1.2. The Use of Photographs and Videos

Parents, carers or relatives may only take still or video photographic images of their children in school or on school organised activities with the prior consent of the School and then only in designated areas. Images taken must be for private use only and not shared via social media or internet sharing sites. If parents do not wish their children to be photographed or filmed by other parents they should express this view and all parents are expected to respect their wishes.

If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult (where they feel confident to do so) and must be reported the matter to the DSL as soon as possible, and in as much detail as possible, to allow the concern to be followed up. The police will be informed in cases of serious concern.

1.3. Teaching Children How to Keep Safe

The School acknowledges the important role that the curriculum can play in the prevention of abuse and in the preparation of pupils for the responsibilities of adult life. The Governors ensure that all pupils are taught about safeguarding, including online, through the curriculum and Life Skills (PSHCE) to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

It is expected that all curriculum coordinators will consider the opportunities that exist within their area of responsibility for promoting the welfare and safety of pupils. As appropriate, the curriculum will be used to build resilience, to judge what kinds of physical contact are acceptable and unacceptable, to help pupils to keep safe and to know how to ask for help if their safety is threatened.

Internet safety (including when children are online at home) is an integral part of the School's curriculum and also embedded in Life Skills (PSCHE) and Relationships and Sex Education and Computing lessons. Relationships and Sex education is included in the curriculum in an age-appropriate manner, as is Online Safety education. Pupils will also be taught how to stay safe online through regular assemblies and this education process is extended to parents with specialist led Online Safety Training opportunities for parents and updates shared via weekly mailings about age appropriate and relevant sites and games that pupils may be able to access.

All computer equipment and internet access within the School will be subject to appropriate "parental controls" and internet safety rules in line with the School's E-Safety Policy and Electronic Device Policy.

The School works to promote 'Healthy School' status through the curriculum with the aim of:

- developing a school ethos, culture, spiritual, moral, social and cultural (SMSC) development provision and environment which encourages a healthy lifestyle for all pupils, including the disadvantaged and vulnerable;
- using the full capacity and flexibility of the curriculum to help pupils to be safe and healthy;
- ensuring that food and drink available across the school day reinforce the healthy lifestyle message
- providing high quality Life Skills (PSCHE) including Relationships and Sex Education (RSE) as part of Personal Development;
- providing high quality Physical Education (PE) and sport to promote physical activity;
- promoting an understanding of the full range of issues and behaviours which impact upon lifelong health and wellbeing, including emotional wellbeing and mental health; and
- working in partnership with parents/carers, local communities, external agencies and volunteers to support the health and wellbeing of all pupils including the vulnerable.

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. Details of the school's systems are given in Appendix E.

1.4. Looked After Children

The Governors ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

The DSL is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

1.5. Arrangements for Visiting Speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised at all times by a member of Dulwich Prep & Senior staff. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In all cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On arrival at the School, Visiting Speakers will be required to show original, current identification documents including a photograph such as a passport or photo card driving licence.

1.6. Use of electronic devices with image sharing capabilities

Staff are not permitted to use their personal mobile devices (including smart watches), or cameras in School where there are pupils present. Staff who wish to take photographs or video footage of pupils must ensure that permission has been given by the pupil's family (by using the pupil 'no photo' list) or obtain their approval before taking any image of a pupil. Staff who wish to use their personal mobile devices or cameras in School for any other reason must first speak with the DSL. Staff who act in breach of this may be subject to disciplinary action. Parents are not permitted to use their electronic devices with image sharing capabilities in or around the School without prior approval from the Head Master. Clear guidance is given to parents and visitors attending school events such as concerts or drama productions regarding the taking photos for private use only.

Pupils are not allowed to carry mobile phones in school although it is understood that those who travel independently to school may have one for safety purposes. All mobile phones must therefore be handed in and will be stored safely in Reception until pupils are ready to leave school when they can be collected. Pupils who wear a smartwatch must have connectivity to any other devices disabled during the school day.

There are two exceptions to the above policy. A member of staff may need to have their phone out momentarily when with pupils to provide a second authentication code for a school system. Members of SLT may need to refer to their phone for TEAMS messages in a CIT situation.

2. EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

2.1. Disqualification from working in childcare

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Safer Recruitment Policy.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which

they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

3. COMPLAINTS

All complaints arising from the operation of this policy will be considered under the School's Complaints Policy and Procedure, with reference to the Local Authority's Strategic Lead Officer for safeguarding in education services as necessary and appropriate. Parents may contact the Independent Schools Inspectorate directly if they wish.

4. WORKING IN PARTNERSHIP WITH PARENTS

It is the School's policy to work in partnership with parents or carers to secure the best outcomes for the children. The School will therefore communicate as clearly as possible about the aims of the School. The School will make available a copy of this policy to any parent who requests it. The policy will also be available through the School's website.

Where appropriate, the School will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If the School believes that notifying the parents or carers would increase the risk to the child, the School will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, the School will normally notify the parents or carers of all the children involved. The School will think carefully about what information it provides about the other child involved, and when. The School will work with the police and/or local authority children's social care to make sure the approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed; and
- meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s).

PART 5: APPENDICES

APPENDIX A: FORM SIGNED BY STAFF

Safeguarding Children at Dulwich Prep & Senior

WHAT IS CHILD PROTECTION?

Protecting specific children who are suffering or who are at risk from significant harm.

WHAT IS SIGNIFICANT HARM?

- **Physical** harm
- **Neglect**
- **Emotional** abuse
- **Sexual** abuse

IF A CHILD DISCLOSES TO YOU:

- Make sure the child is safe
- Listen and appear to have time
- Stay calm
- Take this seriously
- Reassure the child

NEVER promise to keep secrets and don't ask leading questions

WHAT DO YOU DO?

Explain to the child that if you perceive they are in any danger of harm then you will have to seek advice because you have a duty to protect children and young people.

Record what you have seen, been told or noticed.

Personal Electronic devices including mobile phones and cameras must not be used when children are present.

WHO DO YOU TELL?

Act quickly and share the information with the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead at Dulwich Prep & Senior.

It is your responsibility to alert one of the Safeguarding Team if you suspect, hear or observe any concerns or feel that something isn't right about a child.

The Safeguarding Team are:

Louise Davidson	Head Master ext 201
Karen McDonald-Tuckwell	Head of Lower School, DLS ext 501

DDSLs

Christopher Halls	Head of Early Years ext 301
Shelley Whitehead	Head of Pre-Prep ext 401
Sasanka Velagapudi	Head of Middle School ext 606
Edward Matten	Deputy Head ext 207
Kate Warren	Nurse ext 621

Please sign below to confirm that you have read and understood the above, to confirm that you have received the relevant induction paperwork, and that you are committed to reading *Keeping Child Safe in Education* **and** the School's *Staff Code of Conduct*.

Name.....

Signature..... **Date**.....

Position..... **Dept**.....

Below is a shortened summary of DPL's full Staff Code of Conduct which can be found here. It is designed to provide a summary for those visiting the school for a short period i.e. a day or two and less than a week. If the visitor will be with us for longer, then it is expected they will be briefed on the whole code.

Staff Code of Conduct: Summary

Introduction: The Staff Code of Conduct outlines core ethical values for those working onsite, providing guidance on professional conduct, communication protocols, and compliance with key policies.

Relevance: Applicable to all staff, including volunteers and visiting teachers, in conjunction with safeguarding, social media, ICT use, health and safety, and whistleblowing policies.

Expectations for Teachers: Aligned with the Teachers' Standards, emphasising the responsibility to safeguard pupils and maintain professional conduct.

Conduct Toward Pupils: We expect staff to focus on pupil well-being and professional behaviour. Avoid gratuitous physical contact, ambiguous conduct (verbal or physical), and one-to-one situations. Do not share personal contact details or social media tags, nor communicate via social media sites; be mindful of digital footprints and exercise caution in all use of social media and any web-based presence.

Photography and Images: Taking images of pupils can only be done with written consent, is restricted to school devices and must be data protection compliant. Images cannot be used/passed on outside school.

Personal Care: Do not use pupils' toilets. Ensure children have appropriate privacy when changing clothes, balanced with ensuring an appropriate level of age-appropriate supervision in order to safeguarding pupils.

Transporting Pupils: There are clear guidelines on obtaining parental consent, avoiding lone transportation, and maintaining vehicle safety.

Conduct Toward Colleagues: Emphasis on teamwork, respectful communication, fair assessment, and upholding the school's reputation in the local and wider community.

Conduct Toward Parents and Community: We expect staff to demonstrate the school values and integrity, to establish productive partnerships with parents & the community, to respect parental rights of enquiry & information, to refuse gifts that may impair judgment, and to adhere to communication policies.

Conduct Outside Work: Avoid conduct that could harm the school's reputation, including criminal offences, inappropriate use of technology, and off-premises meetings with pupils without prior approval.

Responsibility for Teaching Quality: Staff are held accountable for their performance; they are expected to employ a range of methods to meet learning needs, to actively develop their skills and practice, to promote a positive learning environment and to comply with School policies.

Equal Treatment: There is a commitment to equal treatment for all, and policies which cover anti-bullying, harassment, victimisation, and discrimination.

Appearance: The dress code is formal, appropriate for the relevant activity / age group, reflecting professionalism and serving as role models for pupils.

Smoking, Alcohol, and Drugs: We expect adherence to the school's policies on smoking, alcohol, and drugs.

Whistleblowing: The School encourages a culture of openness and safety; concerns about staff behaviour should be reported at once to the Head Master.

Identification: All adults are expected to sign in and out at Reception, and to wear a school lanyard, visibly, at all times.

APPENDIX B: FRONT OF HOUSE SAFEGUARDING NOTICE TO ALL VISITORS

WELCOME VISITORS TO DULWICH PREP & SENIOR

OUR SAFEGUARDING RESPONSIBILITIES

This applies to all sections of the School, including Early Years.

Everyone at Dulwich Prep & Senior works together to ensure that children and young people are kept safe by contributing to:

- providing a safe environment for children and young people to learn
- identifying children and young people who are suffering or likely to suffer significant harm,
- taking appropriate action with the aim of making sure they are kept safe both at home and at Dulwich Prep & Senior

If you have any concerns about a child's well-being during your visit, speak to the **Designated Safeguarding Lead (DSL)**:

Karen McDonald-Tuckwell

020 8766 5533

Dulwich Prep & Senior's Safeguarding (Child Protection) Policy contains more detailed information about our safeguarding responsibilities, procedures and signs of abuse, neglect or exploitation and can be accessed on the School website.

APPENDIX C: KEY CONTACT DETAILS INCLUDING FOR LOCAL CHILDREN'S SERVICES & KEY EXTERNAL CONTACT DETAILS

As set out in this Safeguarding (Child Protection) Policy, **any member of staff can and should make a referral** to Children's Services if they feel that the Safeguarding Team is not taking appropriate action or in the case of an emergency. This Appendix sets out information to allow them to do this.

<p>Local Authority Designated Officer</p>	<p>Eva Simcock TEL: 020 7525 0689 MOBILE: 07943076608 EMAIL: Eva.Simcock@southwark.gov.uk</p> <p>There is a duty system and one of the CP Coordinators in Quality Assurance Unit is on duty each day to deal with DO issues. TEL (for all DO enquiries/referrals): 020 7525 3297</p> <p>The LA's Strategic Lead Officer for safeguarding in education services: Nina Dohel TEL: 0207 525 3252</p> <p>The LA's Deputy HS Duty Manager TEL: 020 7525 3893</p> <p>The LA's Schools Safeguarding Coordinator: Apo ÇAĞIRICI TEL: 020 7525 2715</p> <p>EHS Duty Officer (Education) TEL: 020 7525 3893</p>
<p>Local Authority Children's Social Services</p>	<p>Although Dulwich Prep & Senior is based in Southwark, the pupils come from many surrounding London boroughs and any referrals should be made to the borough in which the child resides. Staff can carry out an internet search using the child's postcode to find out which borough they live in.</p> <p>It is worth noting that, where staff are uncertain, advice can be sought from Southwark who will advise about how best to contact other agencies.</p> <p>SOUTHWARK:</p> <p>In hours: 020 7525 1921</p> <p>Out of hours: 020 7525 5000</p> <p>Schools' safeguarding coordinator (for advice): 020 7525 2715</p>

	<p>CROYDON:</p> <p>Safeguarding Consultation line – for advice about whether a referral is appropriate: 020 8726 6464</p> <p>Croydon Contact Line – where there is an immediate need for a safeguarding response because a child is at imminent risk: 020 8726 6400</p> <p>LEWISHAM:</p> <p>In hours: 020 8314 6660</p> <p>Out of hours: 020 8314 6000</p> <p>LAMBETH:</p> <p>In hours: 020 7926 5555</p> <p>Out of hours: 020 7926 1000</p> <p>WANDSWORTH:</p> <p>Duty Team: 020 8871 6622</p> <p>Out of hours: 020 8871 600020</p> <p>MANDATORY REPORTING DUTY - FGM (for details see Appendix D):</p> <p>Local Police: 020 7378 1212</p>
<p>Multi-Agency Safeguarding Hub (MASH)</p>	<p>Southwark Multi Agency Safeguarding Hub</p> <p>TEL: 02075251921</p> <p>EMAIL: mash@southwark.gov.uk</p>
	<p>As well as referral through the normal safeguarding channels, support and advice about extremism can be sought from:</p> <p>Local Police: 020 7378 1212 EMERGENCY: 999</p> <p>NON EMERGENCY NUMBER: 101 EMAIL: Tracey.Crampton@met.police.uk</p> <p>MOBILE: 07787450487</p> <p>Local Authority</p> <p>Southwark Council</p> <p>EMAIL: prevent@southwark.gov.uk mash@southwark.gov.uk</p>

	<p>Department for Education</p> <p>NON-EMERGENCY NUMBER: 020 7340 7264</p> <p>EMAIL: counter.extremism@education.gsi.gov.uk</p>
<p>NSPCC Whistleblowing Advice Line</p>	<p>ADDRESS: Weston House</p> <p>42 Curtain Road London EC2A 3NH</p> <p>TEL: 0800 028 0285</p> <p>EMAIL: help@nspcc.org.uk</p>
<p>Disclosure and Barring Service</p>	<p>ADDRESS: DBS customer services</p> <p>PO Box 3961 Royal Wootton Bassett SN4 4HF</p> <p>TEL: 03000 200 190</p> <p>EMAIL: customerservices@dbb.gov.uk</p>
<p>Teaching Regulation Agency</p>	<p>ADDRESS: Teacher Misconduct</p> <p>Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT</p> <p>TEL: 0207 593 5393</p> <p>EMAIL: misconduct.teacher@education.gov.uk</p>
<p>OFSTED Safeguarding Children</p>	<p>TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm)</p> <p>EMAIL: Whistleblowing@ofsted.gov.uk</p>
<p>Independent Schools Inspectorate</p>	<p>TEL: 0207 600 0100</p> <p>EMAIL: concerns@isi.net</p>

KEY SCHOOL CONTACT DETAILS

<p>Governors</p>	<p>Chair of Governors</p> <p>Kate Kelleher TEL: 020 8766 5539 EMAIL: c.skillings@dulwichpreplondon.org</p> <p>Nominated Safeguarding Governor</p> <p>Henrietta Deasy TEL: 020 8766 5542 EMAIL: c.skillings@dulwichpreplondon.org</p> <p>Assistant Safeguarding Governor</p> <p>Charlie Fairhurst TEL: 020 8766 5542 EMAIL: c.skillings@dulwichpreplondon.org</p>
<p>Designated Safeguarding Lead ("DSL") and Deputy Designated Safeguarding Leads ("DDSLs")</p>	<p>Main DSL for the School (including EYFS)</p> <p>Karen McDonald-Tuckwell, Head of Lower School Tel: 020 8766 5533 EMAIL: k.tuckwell@dulwichpreplondon.org</p> <p>DDSLs</p> <p>Christopher Halls, Head of Early Years Tel: 020 8766 5531 EMAIL: c.halls@dulwichpreplondon.org</p> <p>Sasanka Velagapudi, Head of Middle School Tel: 020 8766 5528 EMAIL: s.velagapudi@dulwichpreplondon.org</p> <p>School Nurse Tel: 020 8766 5512 EMAIL: sister@dulwichpreplondon.org</p> <p>Shelley Whitehead, Head of Pre-Prep Tel: 020 8766 5505 EMAIL: s.whitehead@dulwichpreplondon.org</p>
<p>Designated Teacher for looked After Children</p>	<p>Karen McDonald-Tuckwell, Head of Lower School Tel: 020 8766 5533 EMAIL: k.tuckwell@dulwichpreplondon.org</p>
<p>Head Master</p>	<p>Louise Davidson Tel: 020 8766 5524 EMAIL: head_master@dulwichpreplondon.org</p>
<p>Network Manager</p>	<p>Carlos Acquah Tel: 020 8766 5500 EMAIL: c.acquah@dulwichpreplondon.org</p>

APPENDIX D: FURTHER PROCEDURES TO ADDRESS SAFEGUARDING SITUATIONS

1. What staff should do if a child is seen as at risk of radicalisation

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or submit a referral form to MASH or call them directly. Advice and support can also be sought from children's social care.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head Master, DSL, DDSLs (as required) and Governor responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

2. What staff should do if they have concerns that children are at risk from or involved with serious violent crime

All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL or a DDSL to agree a course of action, although staff can make a direct referral to Children's Social Care.

3. What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or being absent from education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Any incidents or concerns involving children who are subject to a Child Protection Plan will be reported immediately to the allocated Social Worker (and confirmed in writing, copied to the Local Authority's Schools Safeguarding Coordinator). If the pupil in question is a 'Looked After' child, this will also be brought to the notice of the DSL with responsibility for children in public care. This person is Karen McDonald-Tuckwell, whose contact details can be found at **Appendix C** of this policy.

4. What staff should do if they discover an act of Female Genital Mutilation ("FGM")

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate.

APPENDIX E: UNDERSTANDING FILTERING AND MONITORING

1. What is filtering and monitoring?

Filtering and monitoring systems are used to keep pupils safe when using the School's IT system.

- filtering systems: block access to harmful sites and content; and
- monitoring systems: identify when a user accesses or searches for certain types of harmful content on school and college devices (it doesn't stop someone accessing it). The School is then alerted to any concerning content so you can intervene and respond.

No filtering and monitoring system is 100% effective, so you need to use it alongside your existing safeguarding systems and procedures.

2. What do I need to know about filtering and monitoring?

All staff should be clear on the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of their safeguarding training.

This will include:

- playing their part in the classroom to monitor what's on pupils' screens;
- ensuring they provide links to suitable webpages;
- ensuring they have viewed all online content before use with pupils; and
- understanding the basics of the School filtering and monitoring systems.

Staff should know how to report safeguarding and technical concerns, such as if:

- they witness or suspect unsuitable material has been accessed;
- they are able to access unsuitable material;
- they are teaching topics that could create unusual activity on the filtering logs;
- there is failure in the software or abuse of the system;
- there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks; and
- they notice abbreviations or misspellings that allow access to restricted material.

In the case of Dulwich Prep & Senior this means informing the DSL (or a DDSL) and the Network Manager as soon as possible.

Senior leaders and all relevant staff need to be aware of and understand:

- what provisions your school has in place and how to manage these provisions effectively; and
- how to escalate concerns when they identify them again informing the DSL (a DDSL) and the Network Manager.

They're also responsible for:

- buying-in the filtering and monitoring system the School uses;

- documenting what is blocked or allowed, and why;
- reviewing the effectiveness of the provision, making sure that incidents are urgently picked up, acted on and outcomes are recorded;
- overseeing reports; and
- making sure staff are trained appropriately and understand their role.

The DSL should take lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place - this is part of their role in taking the lead responsibility for safeguarding.

This includes overseeing and acting on:

- filtering and monitoring reports;
- safeguarding concerns; and
- checks to filtering and monitoring systems.

3. What does my school need to do?

The School should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems: Network Manager;
- review filtering and monitoring provision at least annually: Director of IT/Ass Head;
- block harmful and inappropriate content without unreasonably impacting teaching and learning; and
- have effective monitoring strategies in place that meet the School's safeguarding needs.

4. Details of School Filtering and Monitoring

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online.

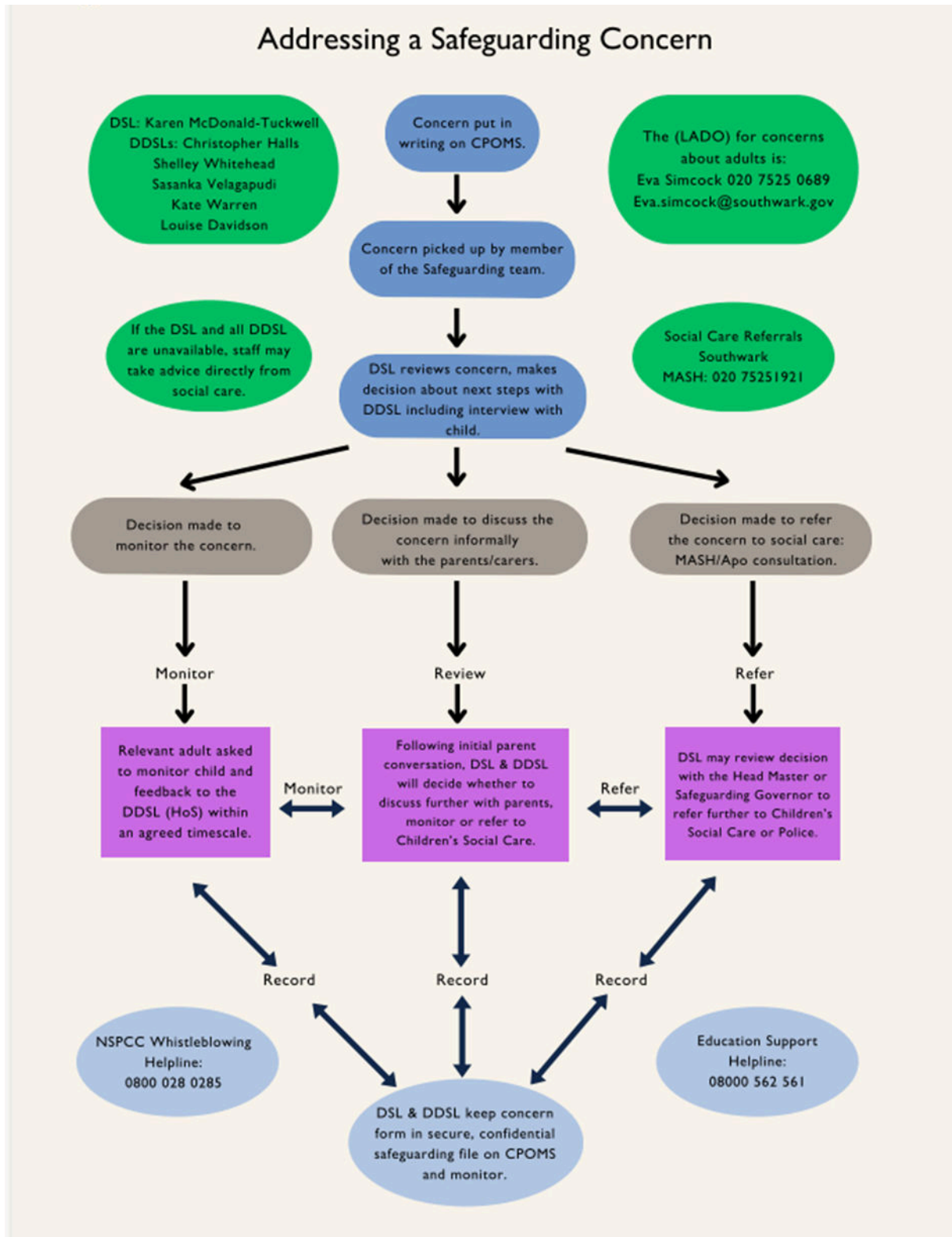
The School's systems are 2 x Watchguard M500 Firewall (content filtering, sandboxing, URL blacklisting and live traffic monitoring), NetSupport DNA (live content aware filtering and keyword phrase matching) and Software (all programs and apps are vetted and approved prior to installation).

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.

Further detail of the School's approach to online safety can be found in the School's E-Safety Policy and Electronic Device Policy.

Pupils in Years 7 and above can take their iPads home. To ensure a consistent eSafety approach and to minimise the risks involved when logging into a non-school network, the safeguarding and security set-ups for the iPads are run off the same system as the School's.

APPENDIX F: SAFEGUARDING PROCESS



APPENDIX G: THE SEVEN GOLDEN RULES FOR SHARING INFORMATION (INCLUDING PERSONAL INFORMATION)

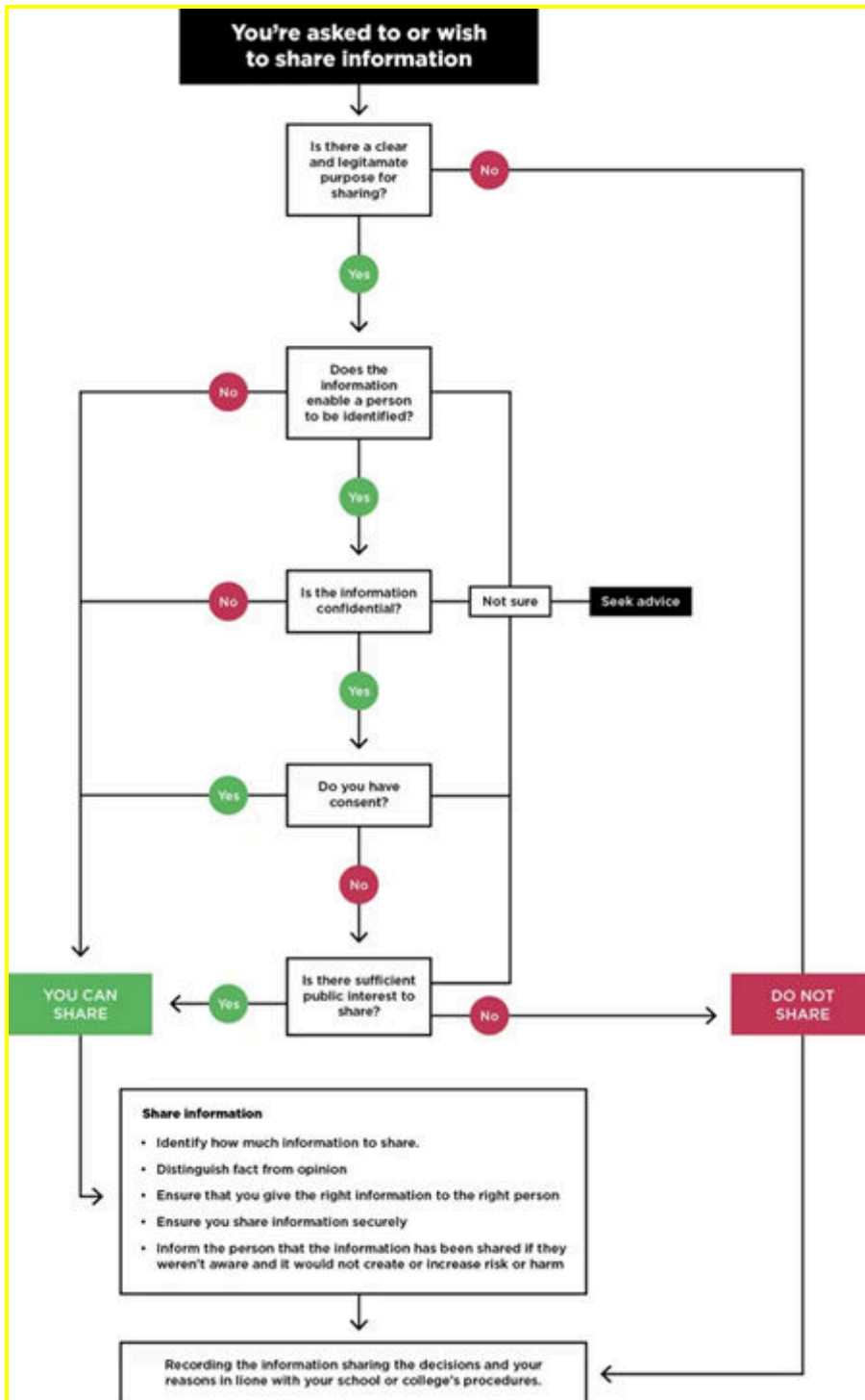
- 1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them.** The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.
- 2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why.** You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).
- 3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm.** You need a lawful basis to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.
- 4. Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case.** Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. Instead, find out who in your organisation/agency can provide advice about what information to share and with whom. This may be your manager/supervisor, the designated safeguarding children professional, the data protection/information governance lead (e.g., Data Protection Officer), Caldicott Guardian, or relevant policy or legal team. If you work for a small charity or voluntary organisation, follow the NSPCC's safeguarding guidance.
5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.
- 6. Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services.** Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.
- 7. Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information.** When another practitioner or organisation

requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.

Please also refer to the following:

Government guidance: [Sharing Advice for practitioners providing safeguarding services for children, young people, parents and carers:](#)

- Flowchart:



APPENDIX H: GUIDELINES AND ACTIONS NEEDED FOR CONCERN REGARDING THE SHARING OF NUDES AND SEMI-NUDES

What is meant by sharing nudes and semi-nudes?

In the latest advice for education settings (UKCIS, 2024), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. Nudes and semi-nudes can be shared online via social media, gaming platforms, chat apps, forums, or involve sharing between devices using offline services. Terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and sharing nude and semi-nudes are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

What to do if an incident comes to your attention:

Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately. Your setting's child protection policy should outline codes of practice to be followed.

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal. *
- If you have already viewed the imagery by accident (e.g. if someone has shown it to you before you could stop them), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

* In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent).

[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)